

PHILLIP A. TALBERT  
United States Attorney  
KAREN A. ESCOBAR  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JORGE CALDERON-CAMPOS,  
BYRON ADILIO ALFARO-SANDOVAL,  
JOSE ANGEL BELTRAN-CHAIDEZ, AND  
MARK GARCIA,  
  
Defendants.

CASE NO. 1:22-CR-00131-JLT-SKO  
  
STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT  
  
DATE: May 15, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Magistrate Judge Sheila K. Oberto

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JORGE CALDERON-CAMPOS,  
  
Defendant.

CASE NO. 1:22-CR-00130-JLT-SKO  
  
STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT  
  
DATE: May 15, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Magistrate Judge Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, these matters were scheduled for a status conference on May 15, 2024, before U.S. Magistrate Judge Sheila K. Oberto. On April 24, 2024, the Court also directed the parties to set a trial date.

1           2.       The parties stipulate to a January 28, 2025, trial date in the above-captioned matter. It is  
2 requested that the status conference currently set for May 15, 2024, be vacated, and to exclude time from  
3 calculation under the Speedy Trial Act between May 15, 2024, and January 28, 2025.

4           3.       The parties agree and stipulate, and request that the Court find the following:

5               a)       Discovery has been provided to the defense in this matter. This material consists  
6 primarily of wiretap intercepts and data, reports of investigation, photographs, recordings of  
7 post-arrest interviews, and defendants' criminal histories.

8               b)       Plea offers have been made to all of the defendants.

9               c)       Counsel for defendants desire additional time to review discovery, consult with  
10 their clients, conduct investigation and research related to the charges, consider plea offers,  
11 engage in plea negotiations, and to otherwise prepare for trial.

12              d)       Counsel for defendants believe that failure to grant the above-requested  
13 continuance would deny them the reasonable time necessary for effective preparation, taking into  
14 account the exercise of due diligence.

15              e)       Based on the above-stated findings, the ends of justice served by continuing the  
16 case as requested outweigh the interest of the public and the defendants in a trial within the  
17 original date prescribed by the Speedy Trial Act.

18              f)       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
19 *et seq.*, within which trial must commence, the time period of May 15, 2024 to January 28, 2025,  
20 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results  
21 from a continuance granted by the Court at the defendants' request on the basis of the Court's  
22 finding that the ends of justice served by taking such action outweigh the best interest of the  
23 public and the defendants in a speedy trial.

24           4.       Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial  
26 must commence.

27           IT IS SO STIPULATED.  
28

Dated: May 8, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ KAREN A. ESCOBAR  
KAREN A. ESCOBAR  
Assistant United States Attorney

/s/ DAVID A. TORRES  
DAVID A. TORRES  
Counsel for defendant Jorge Calderon-Campos

/s/ FATIMA RODRIGUEZ  
FATIMA RODRIGUEZ  
Counsel for defendant Byron Adilio Alfaro-Sandoval

/s/ MONICA BERMUDEZ  
MONICA BERMUDEZ  
Counsel for defendant Jose Angel Beltran-Chaidez

/s/ MARK A. BROUGHTON  
MARK A. BROUGHTON  
Counsel for defendant Mark Garcia

**ORDER**

IT IS SO ORDERED.

DATED: 5/9/2024

*Sheila K. Oberto*  
THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE